



Independent Market Operator

Final Rule Change Report

**Title: Correction of Minor,
Typographical and
Manifest Errors**

Ref: RC_2010_26

Date: 19 October 2010

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Independent Market Operator

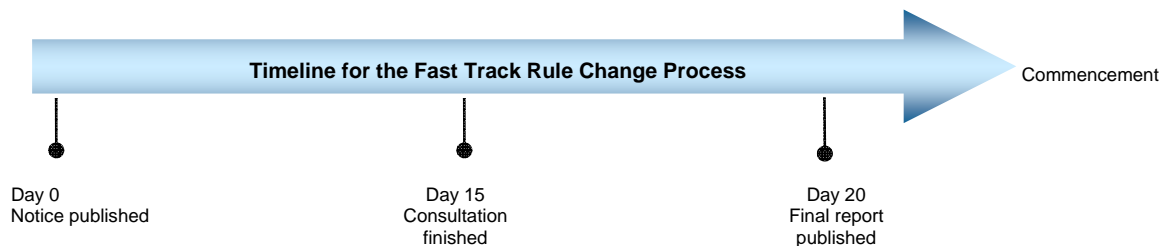
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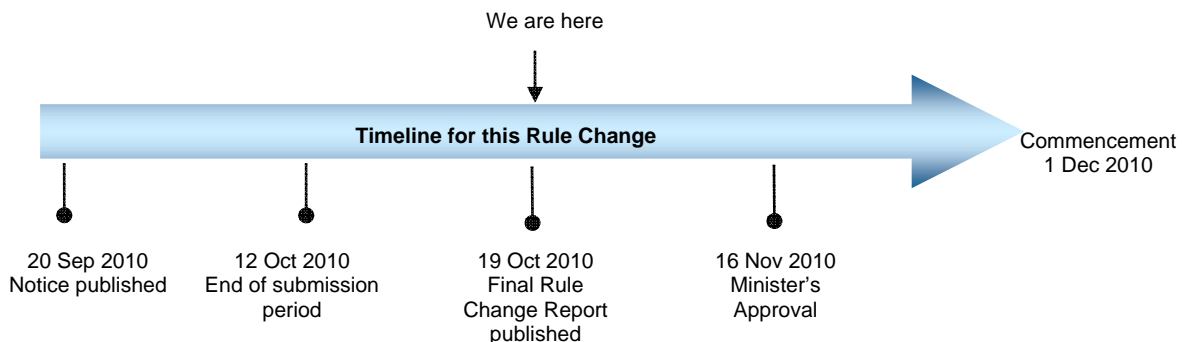
1. INTRODUCTION

On 20 September 2010 the Independent Market Operator (IMO) initiated a Rule Change Proposal regarding amendments to clauses 2.10.7, 2.34.2A, 2.34.10, 2.37.5, 3.4.5, 3.5.6, 3.17.1, 3.17.6, 3.21.4, 3.21.7, 4.8.3, 6.2.2, 6.2.2A, 6.2A.2, 6.3A.2, 6.3A.3, 6.3B.1B, 6.3B.3, 6.3C.3, 6.3C.9, 6.4.1, 6.4.3, 6.5.1A, 6.5.2, 6.5A.2, 6.5C.2, 6.5.4, 6.5C.6, 6.6.2A, 6.6.5, 6.7.2, 6.14.1, 6.16.1, 6.18.2, 6.19.3, 6.19.4, 6.19.9, 6.20.1, 6.20.9A, 6.21.1, 6.21.2, 7.10.5 (due to commence 1 December 2010 as part of RC_2009_22), 7.11.3, 7.11.4, 7.11.6A, 7.11.9, 8.7.1, 9.4.5, 9.4.7, 9.17.3, 9.18.3, 9.19.5, 9.20.5, 9.20.7, 9.24.10, 10.5.1, 10.7.1, 10.8.2 and the Glossary of the Wholesale Electricity Market Rules (Market Rules).

This proposal was processed using the Fast Track Rule Change Process, described in section 2.6 of the Market Rules. The fast track process adheres to the following timelines:



The key dates in processing this Rule Change Proposal are:



The IMO's final decision is to implement the Rule Change Proposal in the form outlined in section 6.2 of this report. The decision is based on the IMO's assessment of the Rule Change Proposal against the:

- Wholesale Market Objectives;
- practicality and cost of implementing the proposal; and
- outcomes from the public consultation period.

The amendments to the Market Rules made as a result of this Rule Change Proposal will commence at 8.00am on 1 December 2010.

All documents related to this Rule Change Proposal can be found on the IMO website: http://www.imowa.com.au/RC_2010_26

2. THE RULE CHANGE PROPOSAL

2.1 Submission Details

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Date submitted:	20 September 2010
Urgency:	Low
Change Proposal title:	Correction of minor, typographical and manifest errors
Market Rules affected:	Clauses 2.10.7, 2.34.2A, 2.34.10, 2.37.5, 3.4.5, 3.5.6, 3.17.1, 3.17.6, 3.21.4, 3.21.7, 4.8.3, 6.2.2, 6.2.2A, 6.2A.2, 6.3A.2, 6.3A.3, 6.3B.1B, 6.3B.3, 6.3C.3, 6.3C.9, 6.4.1, 6.4.3, 6.5.1A, 6.5.2, 6.5A.2, 6.5C.2, 6.5.4, 6.5C.6, 6.6.2A, 6.6.5, 6.7.2, 6.14.1, 6.16.1, 6.18.2, 6.19.3, 6.19.4, 6.19.9, 6.20.1, 6.20.9A, 6.21.1, 6.21.2, 7.10.5 (due to commence 1 December 2010 as part of RC_2009_22), 7.11.3, 7.11.4, 7.11.6A, 7.11.9, 8.7.1, 9.4.5, 9.4.7, 9.17.3, 9.18.3, 9.19.5, 9.20.5, 9.20.7, 9.24.10, 10.5.1, 10.7.1, 10.8.2 and the Glossary.

2.2 Details of the Proposal

In its Rule Change Proposal the IMO noted that as part of its ongoing review of the Market Rules, it has committed to submitting three Rule Change Proposals per year to address minor and typographical errors that have been identified. The IMO noted that this Rule Change Proposal constitutes the second minor, typographical and manifest error proposal for 2010.

Detailed information on the proposal is contained in Appendix 1 and can also be found in the Rule Change Proposal available on the IMO's website.

2.3 The Proposal and the Wholesale Market Objectives

In its proposal the IMO submitted that the proposed Amending Rules will improve the integrity of the Market Rules, and are consistent with the Wholesale Market Objectives.

2.4 The Amending Rules Proposed by the IMO

The amendments to the Market Rules originally proposed by the IMO can be found in the Rule Change Proposal available on the IMO's website.

2.5 The IMO's Initial Assessment of the Proposal

The IMO decided to process the Rule Change Proposal using the Fast Track Rule Change Process, described in clause 2.6 of the Market Rules, on the basis that it satisfied the criteria in clauses 2.5.9(a) and 2.5.9 (b) of the Market Rules.



Clause 2.5.9 states:

The IMO may subject a Rule Change Proposal to the Fast Track Rule Change Process if, in its opinion, the Rule Change Proposal:

(a) is of a minor or procedural nature; or

(b) is required to correct a manifest error; or

(c) is urgently required and is essential for the safe, effective and reliable operation of the market or the SWIS.

The IMO considered in its Rule Change Proposal that:

- not being able to take into account a submission because it is on a non-standard form (clause 2.7.10); and
- an incorrect clause reference (clause 9.4.7); and
- precluding System Management from doing what was intended with RC_2009_22: Tolerances for Compliance Reporting (new clause 7.10.5¹);

are manifest errors. As such, the amendments correcting clause references fulfilled clause 2.5.9(b), in that they were required to correct a manifest error, and therefore could be fast-tracked.

Additionally, the IMO considered that the remaining proposed changes consisted of minor and typographical amendments which would improve the integrity of the Market Rules. The changes did not seek to amend the operation of the Market Rules. As such, the IMO considered that the proposal fulfilled clause 2.5.9(a), in that it was of a minor or procedural nature, and therefore could be fast-tracked.

Further details of the IMO's fast track assessment are presented in Appendix 1 of this Rule Change Report.

3. CONSULTATION

An invitation for all Rule Participants to contact the IMO, should they wish to be consulted on this Rule Change, was published on the IMO website on 20 September 2010, together with the Rule Change Notice.

The consultation period for this Rule Change Proposal was between 21 September 2010 and 12 October 2010. Interested stakeholders were requested to inform the IMO if they wished to be consulted on this Rule Change Proposal by 28 September 2010.

¹ See www.imowa.com.au/RC_2009_22

3.1 Submissions received

The IMO did not receive any formal requests to be consulted on the Rule Change Proposal during this time. The IMO did however receive two out-of-session submissions prior to the closure of the consultation period from Landfill Gas & Power (LGP) and Perth Energy. Further details of these out-of-session submissions are summarised below, with full text available on the IMO's website.

Both LGP and Perth Energy support the IMO's proposed amendments to the Market Rules. In particular, Perth Energy notes its support of the IMO's process of continuous review and improvement of the Market Rules.

In particular Perth Energy acknowledges the intent of:

- the IMO to be flexible in the way it addresses its stakeholder's needs, contemplating Procedure Change Proposals in formats other than the standard form (clause 2.10.7). Perth Energy noted that its preference was for proposals to remain in a consistent format, but however accepted there were occasions when this may not be possible.
- RC_2010_22²: Tolerances for Compliance Reporting was to exempt System Management from having to warn Market Participants in such circumstances. Perth Energy therefore supports the correction to the manifest error in the drafting of clause 7.10.5.

Perth Energy also agreed that cross referencing errors within the Market Rules does constitute a manifest error. As such, Perth Energy supports the IMO's proposal to correct the cross referencing in clause 9.4.7.

4. THE IMO'S ASSESSMENT

In preparing this Final Rule Change Report, the IMO must assess the Rule Change Proposal in light of clauses 2.4.2 and 2.4.3 of the Market Rules.

Clause 2.4.2 outlines that the IMO "must not make Amending Rules unless it is satisfied that the Market Rules, as proposed to be amended or replaced, are consistent with the Wholesale Market Objectives".

Additionally, clause 2.4.3 states, when deciding whether to make Amending Rules, the IMO must have regard to the following:

- any applicable policy direction from the Minister regarding the development of the market;
- the practicality and cost of implementing the proposal;
- the views expressed in submissions and by the MAC; and

² See www.imowa.com.au/RC_2009_22

- any technical studies that the IMO considers necessary to assist in assessing the Rule Change Proposal.

The IMO notes that there has not been any applicable policy direction from the Minister, nor have there been any technical studies commissioned in respect of this Rule Change Proposal.

This IMO's assessment is outlined in the following sections.

4.1 Wholesale Market Objectives

The IMO considers that the Market Rules as a whole, if amended, will be consistent with the Wholesale Market Objectives.

Wholesale Market Objective	Consistent with objective
(a) to promote the economically efficient, safe and reliable production and supply of electricity and electricity related services in the South West interconnected system	Yes
(b) to encourage competition among generators and retailers in the South West interconnected system, including by facilitating efficient entry of new competitors	Yes
(c) to avoid discrimination in that market against particular energy options and technologies, including sustainable energy options and technologies such as those that make use of renewable resources or that reduce overall greenhouse gas emissions	Yes
(d) to minimise the long-term cost of electricity supplied to customers from the South West interconnected system	Yes
(e) to encourage the taking of measures to manage the amount of electricity used and when it is used	Yes

4.2 Practicality and cost of implementation

The proposed changes do not require any change to the Wholesale Electricity Market Systems operated by the IMO or any of the systems operated by System Management.

There have been no additional costs identified with the implementation of this Rule Change Proposal.

4.3 Views expressed in submissions

The IMO received two out-of-sessions submissions for this rule change from LGP and Perth Energy, with both submissions supporting the proposed changes.

4.4 Views of the Market Advisory Committee

The MAC did not meet to discuss this Rule Change Proposal.

5. THE IMO'S FINAL DECISION

The IMO's final decision is to accept the Rule Change Proposal as modified by the amendments specified in section 3.2 of this report.

5.1 *Reasons for the decision*

The IMO has made its decision on the basis that the Amending Rules:

- are consistent with the Wholesale Market Objectives;
- will improve the integrity of the Market Rules; and
- can be easily implemented at no additional cost to the Market.

Additional detail outlining the analysis behind the IMO's reasons is outlined in section 4 of this Final Rule Change Report.

6. AMENDING RULES

6.1 *Commencement*

The amendments to the Market Rules resulting from this Rule Change Proposal will commence at **8:00am** on **1 December 2010**.

6.2 *Amending Rules*

The following clauses are amended (~~deleted wording~~, new wording):

2.10.7. At the same time as it publishes a Procedure Change Proposal notice, the IMO must publish a call for submissions on that proposal. The due date for submissions must be 20 Business Days from the date the call for submissions is published. Any person may make a submission to the IMO relating to a Procedure Change Proposal. A Procedure Change Submission may be made using the a-Procedure Change Submission form maintained on the Market Web Site in accordance with clause 2.9.4.

2.34.2A. A Rule Participant must, as soon as ~~practical~~ practicable, seek to have its Standing Data revised, other than Standing Data described in clause 2.34.2B, if it becomes aware that its Standing Data is currently inaccurate or not in compliance with the requirements of these Market Rules, or will become inaccurate or will cease to be in compliance with the requirements of these Market Rules within the next 5 Business Days.

2.34.10. Where System Management becomes aware that a Rule Participant's Standing Data is currently inaccurate, or will become inaccurate as of a date in the future,

it must, as soon as ~~practical~~ practicable, notify the IMO of the item that it considers to be inaccurate or which will become inaccurate, as the case may be.

- 2.37.5. A Market Participant must notify the IMO as soon as ~~practical~~ practicable where it considers that:
- (a) its metered consumption quantities in a Trading Month will significantly exceed the amount assumed in the last calculation of its Credit Limit; or
 - (b) its quantity of electricity purchased bilaterally in a Trading Month will be significantly lower than assumed in the last calculation of its Credit Limit.
- 3.4.5. System Management must return the SWIS from a High Risk Operating state to a Normal Operating State as soon as ~~it is able~~ practicable.
- 3.5.6. System Management must return the SWIS from an Emergency Operating State to a Normal Operating State as soon as ~~it is able~~ practicable.
- 3.17.1. System Management must carry out a Short Term PASA study:
- (a) every Thursday, and provide the Short Term PASA results referred to in clause 3.17.9 to the IMO by 4:30 PM; and
 - (b) on any other day if it determines that changes have occurred that would materially affect market outcomes during the first week of the period covered by the previous Short Term PASA study, and provide the Short Term PASA results referred to in clause 3.17.9 to the IMO as soon as ~~practical~~ practicable.
- 3.17.6. Where a Rule Participant becomes aware that the information it submitted in accordance with clause 3.17.5 has materially changed during the first week of the period covered by the previous Short Term PASA study, then it must re-submit the relevant data to System Management as soon as ~~possible~~ practicable, and in any case within 24 hours.
- 3.21.4. If a Facility or item of equipment that is on the list described in clause 3.18.2 or a Facility or generation system to which clause 3.18.2A relates suffers a Forced Outage or Consequential Outage, then the relevant Market Participant or Network Operator must inform System Management of the outage as soon as ~~practical~~ practicable. Information provided to System Management must include:
- (a) the time the outage commenced;
 - (b) an estimate of the time the outage is expected to end;
 - (c) the cause of the outage;



- (d) the Facility or item of equipment or Facilities or items of equipment affected; and
- (e) for each affected Facility or item of equipment, the expected quantity of any de-rating by Trading Interval, where, if the Facility is a generating system, this quantity is to be submitted in accordance with clause 3.21.5.

3.21.7 Notwithstanding the requirements of clause 3.21.4 that a relevant Market Participant or Network Operator must inform System Management of a Forced Outage or Consequential Outage as soon as ~~practical~~ practicable, a Market Participant or Network Operator must provide full and final details of the relevant Planned Outage, Forced Outage or Consequential Outage to System Management no later than fifteen calendar days following the Trading Day.

4.8.3. A Market Customer may apply for the certification of a Demand Side Programme including Loads at different locations as a Curtailable Load subject to the following conditions and provisions:

- (a) No Intermittent Load may be included in the Demand Side Programme.
- (b) The Loads comprising the Demand Side Programme must be registered as Curtailable Loads if they are to count towards satisfying the relevant Reserve Capacity Obligations of the Demand Side Programme and must not have been separately awarded Capacity Credits.
- (c) As the Loads comprising the Demand Side Programme are registered, the IMO must assign Certified Reserve Capacity and Reserve Capacity Obligations to those Facilities and must correspondingly reduce the Certified Reserve Capacity and Reserve Capacity Obligations associated with the Demand Side Programme during the time those Facilities are registered.
- (d) After accounting for the modifications in (c), if at any time a Market Customer has Reserve Capacity Obligations associated with its Demand Side Programme then, for settlement purposes, the Demand Side Programme must be treated by the IMO as a Facility that has failed to satisfy its Reserve Capacity Obligations.
- (e) Loads comprising the Demand Side Programme must have the same or higher availability as the Demand Side Programme.

6.2.2. Where the IMO holds a Standing Bilateral Submission for a Market Generator as at the time specified in clause 6.2.1(a), where that Standing Bilateral Submission is applicable to the Trading Day to which clause 6.2.1 relates and where that Standing Bilateral Submission conforms to the requirements of clause 6.7 at that



time, the IMO must make it the Bilateral Submission with respect to the Trading Day as at the time specified in clause 6.2.1(a).

- 6.2.2A. When the IMO receives Bilateral Submission data from a Market Generator during the time interval described in clause 6.2.1, it must as soon as ~~practical~~ practicable communicate to that Market Generator whether or not the IMO accepts the data as conforming to the requirements of clause 6.7. Where the IMO accepts the data then the IMO must revise the Bilateral Submission to reflect that data.
- 6.2A.2. When the IMO receives Standing Bilateral Submission data from a Market Generator during the time interval described in clause 6.2A.1, it must as soon as ~~practical~~ practicable communicate to that Market Generator whether or not the IMO accepts the data as conforming to the requirements of clause 6.7. Where the IMO accepts the data then the IMO must revise the Standing Bilateral Submission to reflect that data.
- 6.3A.2. By 9:00 AM on the Scheduling Day the IMO must have calculated and released to each Market Participant the following parameters to be ~~respected~~ applied by that Market Participant in forming its STEM Submissions for each Trading Interval in the Trading Day:

...

- (c) for each Scheduled Generator and Non-Scheduled Generator that is registered as being able to run on Liquid Fuel only, the maximum Loss Factor adjusted quantity of energy, in units of MWh, that could be supplied during the Trading Interval based on the Standing Data of that Scheduled Generator or Non-Scheduled Generator less an allowance for outages of which the IMO has been made aware by System Management in accordance with clauses 7.3.4 or 7.3.6; ~~and~~
- (d) for each Scheduled Generator and Non-Scheduled Generator that is registered as being able to run on both Liquid Fuel and Non-Liquid Fuel, the maximum Loss Factor adjusted quantity of energy, in units of MWh, that could be supplied during the Trading Interval when run on each of Liquid Fuel and Non-Liquid Fuel based on the Standing Data of that Scheduled Generator or Non-Scheduled Generator less an allowance for outages of which the IMO has been made aware by System Management in accordance with clauses 7.3.4 or 7.3.6; ~~and~~
- (e) in the case of each Market Participant that is a provider of Ancillary Services:

...



6.3A.3. By 9:05 AM on the Scheduling Day the IMO must have calculated and released to each Market Participant the following parameters for information in forming its STEM Submissions for each Trading Interval in the Trading Day:

- (a) The total quantity of ~~capacity credits~~ Capacity Credits held by that Market Participant for the Trading Day, in units of MW;
- (b) The estimated Loss Factor adjusted quantity of energy that could potentially be called upon by System Management after 1:00 PM on the Scheduling Day to meet Ancillary Service requirements for each Trading Interval of the Trading Day, multiplied by 2, in units of MW;
- (c) The total quantity of ~~planned outages~~ Planned Outages and ~~consequential outages~~ Consequential Outages for that Market Participant of which the IMO has been made aware by System Management in accordance with clauses 7.3.4 or 7.3.6, in units of MW;
- (d) The total quantity specified in any STEM submission ~~portfolio supply curve~~ Portfolio Supply Curve from that Market Participant that has been accepted by the IMO for that Trading Interval, multiplied by 2, in units of MW; and
- (e) The total quantity specified in any STEM submission Ancillary Service Declaration from that Market Participant that has been accepted by the IMO for that Trading Interval, multiplied by 2, in units of MW.

6.3B.1B. If the Market Participant's Standing STEM Submission has not been successfully converted into a daily STEM Submission for the Trading Day in accordance with clause 6.3B.1A, then the IMO must adjust the Standing STEM Submission to make it a valid STEM Submission with respect to the Trading Day. The adjustment will be made as follows:

- (a) if the cumulative MWh quantity over all Price-Quantity Pairs is greater than the Maximum Supply Capability as calculated under clause 6.3A.2(a), the Price-Quantity Pairs will be adjusted downward so that the cumulative MWh quantity over all Price-Quantity Pairs equals the Maximum Supply Capability. This will be achieved by deleting successively or reducing the highest price Price-Quantity Pairs until the ~~cumulative~~ cumulative MWh quantity over all remaining Price-Quantity Pairs equals the Maximum Supply Capability as calculated under clause 6.3A.2(a);

...



6.3B.3. When the IMO receives STEM Submission data from a Market Participant during the time interval described in clause 6.3B.1, it must as soon as ~~practical~~ practicable communicate to that Market Participant:

- (a) [Blank]
- (b) whether or not the IMO accepts the received STEM Submission data as conforming to the requirements of clause 6.6;
- (c) [Blank]

where, if the IMO accepts the data, the STEM Submission held by the IMO must be revised to reflect that data.

6.3C.3. When the IMO receives Standing STEM Submission data from a Market Participant during the time interval described in clause 6.3C.1, it must as soon as ~~practical~~ practicable communicate to that Market Participant:

- (a) whether or not the IMO accepts received Standing STEM Submission data as conforming to the requirements of clause 6.6;
- (b) [Blank]

where, if the IMO accepts the data, the IMO must revise the Standing STEM Submission to reflect that data.

6.3C.9. If a Market Participant's ability to consume or supply energy in any Trading Interval of a Trading Day is less than the maximum level of its STEM supply or consumption as indicated by its current Standing STEM Submission then that Market Participant must either:

- (a) submit to the IMO Standing STEM Submission data so as to revise its Standing STEM Submission to comply with this clause 6.3C.9; or
- (b) for each Trading Interval for which the current Standing STEM Submission over-states the Market Participant's supply or consumption capabilities, submit valid STEM Submission data to the IMO on the Scheduling Day immediately prior to that Trading Day.

6.4.1. The IMO must undertake the process described in clause 6.9 and determine the STEM Auction results for a Trading Day no earlier than ~~at~~ 10:00 AM, and no later than 10:30 AM, on the relevant Scheduling Day;

6.4.3. The IMO must make available to each Market Participant the following information in relation to a Trading Day by 10:30 AM on the relevant Scheduling Day:



- (a) the Trading Intervals, if any, in which the STEM Auction was suspended;
- (b) the STEM Clearing Price in all Trading Intervals for which the STEM Auction was not suspended;
- (c) the quantities scheduled in respect of that Market Participant in the STEM Auction for each Trading Interval; and
- (d) the Net Contract Position of the Market Participant in each Trading Interval, as determined in accordance with clause 6.9.13.

6.5.1A. Market Generators with Registered Facilities that are not undergoing a Commissioning Test, except those with only Intermittent Generators, or Market Customers with Dispatchable Loads must provide the IMO with a Resource Plan Submission, either via submitting Resource Plan Submissions or in accordance with clause 6.5.1B.

6.5.2. When the IMO receives Resource Plan Submission data from a Market Participant during the time interval described in clause 6.5.1, it must as soon as ~~practical~~ practicable communicate to that Market Participant whether or not the IMO accepts the data as conforming to the requirements of clause 6.11.2. Where the IMO accepts the data then the IMO must revise the Resource Plan Submission to reflect that data.

6.5A.2. When the IMO receives Balancing Data Submission data from a Market Participant during the time interval described in clause 6.5A.1, or a Balancing Data Submission is derived from Standing Balancing Data in accordance with clause 6.5A.1A, it must as soon as ~~practical~~ practicable communicate to that Market Participant whether or not the IMO accepts the data as conforming to the requirements of clause 6.11A.2. Where the IMO accepts the data then the IMO must revise the Balancing Data Submission to reflect that data.

6.5C.2. When the IMO receives Standing STEM Resource Plan data from a Market Participant during the time interval described in clause 6.5C.1, it must as soon as ~~practical~~ practicable communicate to that Market Participant whether or not the IMO accepts the received data as conforming to the requirements of clause 6.11.2; and where the IMO accepts the data then the IMO must revise the Standing Resource Plan Submission to reflect that data.

6.5.4. If the IMO has not accepted a Resource Plan Submission for a Trading Day by the closing time specified in clause 6.5.1(b) from a Market Participant that is required to make a Resource Plan Submission or a Market Participant covered by clause 6.5.1C, then it must prepare a default Resource Plan for that Market Participant which must include, for each Trading Interval on the Trading Day:



- (a) all the Market Participant's Scheduled Generators and Non-Scheduled Generators having a scheduled output of zero;
- (b) all Dispatchable Loads having a scheduled consumption of zero; and
- (c) the level of the supply shortfall required pursuant to clause 6.11.1(e) equal to the total Net Contract Position.

6.5C.6. If a Market Participant's ability to consume or supply energy in any Trading Interval of a Trading Day is less than the maximum level of its supply or consumption as indicated by its Standing Resource Plan Submission then that Market Participant must either:

- (a) submit to the IMO Standing Resource Plan Submission data so as to revise its Standing Resource Plan Submission to comply with this clause 6.5C.6; or
- (b) for each Trading Interval for which the Standing Resource Plan Submission over-states the Market Participant's supply or consumption capabilities, submit valid Resource Plan Submission data to the IMO on the Scheduling Day immediately prior to that Trading Day.

6.6.2A For:

- (a) a Fuel Declaration:
 - i. the Market Participant must declare for each of its dual fuel Facilities whether or not that Facility ~~was~~ is assumed to be operating on Liquid Fuel or Non-Liquid Fuel in forming the Portfolio Supply Curve;
- (b) an Availability Declaration:
 - i. the Market Participant must declare for each of its Scheduled Generators and Non-Scheduled Generators:
 1. the maximum Loss Factor Adjusted energy available from that Facility based on its Standing Data reduced to account for any energy committed to provide ~~ancillary services~~ Ancillary Services or which is unavailable due to an outage (where such an outage should only be considered where that outage is reported to the Market Participant by the IMO); less
 2. the quantity of energy assumed to be available from that Facility in forming the Portfolio Supply Curve for the Trading Interval,



if this quantity is greater than zero. The quantity declared must be in units of MWh;

(c) an Ancillary Service Declaration:

i. a Market Participant which is a provider of Ancillary Services must declare:

1. the MWh quantity of energy from Non-Liquid Fuelled Facilities (as defined by the Fuel Declaration) that the Market Participant has not committed for inclusion in the Portfolio Supply Curve because it expects to have to maintain surplus capacity with which to provide Ancillary Services;
2. the MWh quantity of energy from Liquid Fuelled Facilities (as defined by the Fuel Declaration) that the Market Participant has not committed for inclusion in the Portfolio Supply Curve because it expects to have to maintain surplus capacity with which to provide Ancillary Services,

where the sum of the quantities in 1 and 2 must equal the amount specified in clause 6.3A.2(e)(i) for that Market Participant;

(d) a Portfolio Supply Curve:

i. one or more Price-Quantity Pairs may be specified;

ii. the cumulative MWh quantity over all Price-Quantity Pairs must not exceed the greater of zero; and:

1. the Market Participant's Maximum Supply Capability as described in clause 6.3A.2(a); less
2. the total MWh quantity specified by the Market Participant in its Availability Declaration;
3. [Blank]

iii. the cumulative MWh quantity over all Price-Quantity Pairs with prices exceeding the Maximum STEM Price must not exceed:

1. the sum over all Facilities declared in the Fuel Declaration to be operating on Liquid Fuel of the MWh quantity specified in clause 6.3A.2(d); less
2. the total MWh quantity specified by the Market Participant in its Availability Declaration as being unavailable from



Facilities declared in its Fuel Declaration to be operating on Liquid Fuel; less

3. the MWh quantity declared in its Ancillary Service Declaration as being unavailable from Liquid Fuelled Facilities;

(e) a Portfolio Demand Curve:

- i. one or more Price-Quantity Pairs may be specified; and
- ii. the cumulative quantity included in the Price-Quantity Pairs must not exceed the Market Participant's Maximum Consumption ~~Quantity~~ Capability as described in clause 6.3A.2(b).

6.6.5. For Price-Quantity Pairs in Portfolio Supply Curves:

- (a) each Price-Quantity Pair must comprise one price and one quantity;
- (b) each Price-Quantity Pair price must be:
 - i. in units of \$/MWh expressed to a precision of \$0.01/MWh;
 - ii. [Blank]
 - iiA. set such that:
 1. the sum of the Price-Quantity Pair quantities from Price-Quantity Pairs in the Portfolio Supply Curve with prices exceeding the Maximum STEM Price must not exceed the cumulative MWh quantity that the Market Participant can offer at the Alternative Maximum STEM Price, as defined in clause 6.6.2A(d)(iii);
 2. the prices for the Price-Quantity Pairs in the Portfolio Supply Curve to which 1 does not relate must not exceed the Maximum STEM Price;

...

6.7.2. All quantities specified in a Bilateral Submission or a Standing Bilateral Submission:

- (a) must be in units of MWh;
- (b) must equal or exceed 0 MWh for net supply (that is, sold) by the relevant Market Participant;
- (c) must be less than 0 MWh for net consumption (that is, purchased) from the relevant Market Participant;



- (d) must be expressed to a precision of 0.001 MWh; and
 - (e) must be Loss Factor adjusted.
- 6.14.1. Subject to clause 6.14.1A, by 3 PM on the first Business Day following the end of a Trading Day, the IMO must calculate and publish for each Trading Interval on the Trading Day:
- (a) the Marginal Cost Administered Price (MCAP);
 - (b) the ~~Upwards~~ Upward Deviation Administered Price (UDAP); and
 - (c) the ~~Downwards~~ Downward Deviation Administered Price (DDAP),
- in accordance with this clause 6.14.
- 6.16.1. The Metered Schedule for a Trading Interval for a Facility or Non-Dispatchable Load is determined by the IMO in accordance with clause 9.3.3.
- 6.18.2. Subject to clause 6.18.3, the Commitment Compensation equals ~~the sum of:~~
- (a) ~~for each additional start up required of a Scheduled Generator during a Peak Trading Interval or Off-Peak Trading Interval, the dollar amount for a commitment of the Facility specified in Standing Data, as defined in Appendix 1(c)(i); and~~
 - (b) ~~[Blank]~~
 - (c) ~~[Blank]~~
 - (d) ~~[Blank]~~
- 6.19.3. Market Advisories must be released as soon as ~~practical~~ practicable after the IMO becomes aware of a situation requiring the release of a Market Advisory.
- 6.19.4. The IMO must inform Market Participants, Network Operators and System Management of the withdrawal of a Market Advisory as soon as ~~practical~~ practicable once the situation that the Market Advisory relates to has finished.
- 6.19.9. Market ~~participants~~ Participants, Network Operators and System Management must inform the IMO as soon as ~~practical~~ practicable if they become aware of any circumstances that might reasonably be expected to result in the IMO issuing a Market Advisory.
- 6.20.1. The Energy Price Limits are:
- (a) the Maximum STEM Price;
 - (b) the Alternative Maximum STEM Price; and



(c) the Minimum STEM Price.

6.20.9A. Prior to proposing a final revised value to an Energy Price Limit in accordance with clause 6.20.10, the IMO may publish a request for further submissions on the Market Web Site. Where the IMO publishes a request for further submissions in accordance with this clause, it must request submissions from all sectors of the Western Australia energy industry, including end-users.

6.21.1. The IMO must provide the following information to the settlement system for each STEM ~~auction~~ Auction:

- (a) a flag for each Trading Interval indicating if the STEM ~~auction~~ Auction was suspended for that Trading Interval;
- (b) the STEM Clearing Price in each Trading Interval in units of ~~dollars per megawatt hours~~ \$/MWh; and
- (c) for each Market Participant participating in the STEM ~~auction~~ Auction, the STEM quantity scheduled in each Trading Interval, in units of ~~megawatt hours~~ MWh, where this amount must be positive for a sale of energy to the IMO and negative for a purchase of energy from the IMO.

6.21.2. The IMO must provide the following information to the ~~Settlement System~~ settlement system for each Trading Interval in a Trading Day:

- (a) MCAP, UDAP and DDAP; and
- (b) for each Market Participant:
 - i. the Authorised Deviation Quantity;
 - ii. the Upward Unauthorised Deviation Quantity;
 - iii. the Downward Unauthorised Deviation Quantity;
 - iv. [Blank]
 - v. the Dispatch Instruction Payment; and
 - vi. any Commitment Compensation due to the Market Participant.

7.10.5 Subject to clause 7.10.5A, where System Management considers that a Market Participant has not complied with clause 7.10.1 in relation to any of its Registered Facilities in a manner that:

- (a) threatens Power System Security or Power System Reliability; or
- (b) would require System Management to issue instructions to the Registered Facilities of the Electricity Generation Corporation or Registered Facilities



covered by any Balancing Support Contract or Ancillary Service Contract;
or

(c) would require System Management to issue Dispatch Instructions to other Registered Facilities in accordance with clauses 7.6.3 or 7.6.4; ~~or~~ and

(d) is outside:

i. the Tolerance Range determined in accordance with clause 2.13.6D;
or

ii. a Facility Tolerance Range determined in accordance with clause 2.13.6E, or, if applicable, varied in accordance with clause 2.13.6H;

System Management must warn the Market Participant about the deviation and request an explanation for the deviation; and cessation of the behaviour within a time that System Management considers reasonable.

7.11.3. Dispatch Advisories must be released as soon as ~~practical~~ practicable after System Management becomes aware of a situation requiring the release of a Dispatch Advisory.

7.11.4. System Management must inform Market Participants, Network Operators and the IMO of the withdrawal of a Dispatch Advisory as soon as ~~practical~~ practicable once the situation that the Dispatch Advisory relates to has finished.

7.11.6A. If System Management must issue directions to a Market Participant or a Network Operator under a High Risk Operating State or an Emergency Operating State prior to issuing a Dispatch Advisory then System Management may issue such directions as if a Dispatch Advisory had been issued provided that it informs the relevant Market Participant or Network Operator of the applicable operating state as soon as ~~practical~~ practicable.

7.11.9. Market Participants, Network Operators and the IMO must inform System Management as soon as ~~practical~~ practicable if they become aware of any circumstances that might reasonably be expected to result in System Management issuing a Dispatch Advisory.

8.7.1. A Metering Data Agent must operate in accordance with a Metering Protocol. As a minimum a Metering Protocol must prescribe:

(a) that the Metering Data Agent maintains a Meter Registry tracking a unique identifying number for each meter and the location of that meter, and indicating which Market Participant, if any, is associated with that meter;



- (b) that interval meter data is recorded for a 30 minute period starting on the hour and on the half-hour;
- (c) a process for replacing missing or inaccurate metering data with estimated data to be included in Meter Data Submissions;
- (d) a process for addressing metering data errors stemming from errors in meter reading, failure to read a meter and falsification;
- (e) a dispute resolution process pertaining to actions taken in accordance with that Metering Protocol; and
- (f) a process ~~exists~~ for modification of the Metering Protocol in the event of changes to the Market Rules.

9.4.5. As soon as ~~practical~~ practicable, and not later than noon on the Business Day following receipt of a Capacity Credit Allocation Submission, the IMO must notify the submitting Market Participant:

- (a) that the Capacity Credit Allocation Submission has been received; and
- (b) whether the Capacity Credit Allocation Submission has been accepted or rejected, including reasons for rejecting the submission (if appropriate).

9.4.7. The IMO must confirm receipt, by telephone, of a Capacity Credit Allocation Submission from a Market Participant made in accordance with clause 9.4.6 within 30 minutes of receiving the submission, indicating the matters referred to in paragraphs 9.4.5(a), and (b) ~~and~~ (e).

9.17.3. A STEM Market Participant may under clause 9.20 issue a Notice of Disagreement in respect of a STEM Settlement Statement by the STEM Settlement Disagreement ~~Date~~ Deadline.

9.18.3. A Non-STEM Settlement Statement must contain the following information:

- (a) details of the Trading Days covered by the Non-STEM Settlement Statement;
- (b) ~~details~~ the identity of the Market Participant to which the Non-STEM Settlement Statement relates;
- (c) for each Trading Interval of each Trading Day:
 - i. the Bilateral Contract quantities for each Market Participant;
 - ii. the Net Contract Position of the Market Participant;
 - ii(A). the MWh quantity of energy scheduled from each of the Market Participant's Facilities;



- iii. the energy scheduled to be provided in accordance with a Resource Plan ~~data~~-issued by, or applicable to, that Market Participant provided under clause 6.5;
- iv. the Dispatch Schedule data for each of the Market Participant's Registered Facilities;
- v. the meter reading for each Registered Facility associated with the Market Participant and to which paragraph (vii) is not applicable;
- vi. in the case of the Electricity Generation Corporation, the total quantity of energy deemed to have been supplied by the Electricity Generation Corporation's Registered Facilities-;
- vii. Notional Wholesale Meter values;
- viii. the values of MCAP, UDAP, and DDAP;
- viii(A). in the case of the Electricity Generation Corporation the MWh quantity of non-compliance;
- ix. details of amounts calculated for the Market Participant under clauses 9.7 to 9.14 with respect to:
 - 1. Reserve Capacity settlement;
 - 2. Balancing settlement;
 - 3. Ancillary Services settlement;
 - 4. Commitment and ~~O~~utage ~~C~~ompensation settlement;
 - 4A. Non-Compliance Cost settlement;
 - 5. Reconciliation settlement;
 - 6. Network Control Service settlement; ~~and~~
 - 7. Fee settlement; and
 - 8. Net Monthly Non-STEM Settlement Amount;
- x. details of any Capacity Credits allocated to the Market Participant in a Capacity Credit Allocation ~~Statement~~ Submission made by another Market Participant in accordance with clauses 9.4 and 9.5;
- xi. details of any Capacity Credits allocated to another Market Participant in a Capacity Credit Allocation Submission made by the Market Participant in accordance with clauses 9.4 and 9.5;



- xii. details of any reductions in payments in the preceding Trading Month under clause 9.24.3 as a result of a Market Participant being in ~~Default~~ default;
- xiii. details of any payments to the Market Participant as a result of the IMO recovering funds not paid to the Market Participant in previous Trading Months under clause 9.24.3 as a result of a Market Participant being in ~~Default~~ default; and
- xiv. in regard to Default Levy re-allocations, as defined in accordance with clause 9.24.9:
 1. the total amount of Default Levy paid by that Market Participant during the Financial Year, with supporting calculations;
 2. the adjusted allocation of those Default Levies to be paid by that Market Participant, with supporting calculations; and
 3. the net adjustment be made;
- (d) whether the statement is an adjusted Non-STEM Settlement Statement and replaces a previously issued Non-STEM Settlement Statement;
- (e) in the case of an adjusted Non-STEM Settlement Statement, details of all adjustments made relative to the first Non-STEM Settlement Statement issued for that Trading Month with an explanation of the reasons for the adjustments;
- (f) any interest applied in accordance with clause 9.1.3;
- (g) the net dollar amount owed by the Market Participant to the IMO for the billing period (i.e. the Trading Days covered by the Non-STEM Settlement Statement) where this may be a positive or negative amount; and
- (h) all applicable taxes.

9.19.5. A Rule Participant may under clause 9.20 issue a Notice of Disagreement in respect of an adjusted Settlement Statement by the deadline specified under ~~clauses~~ clause 9.16.4(e) in respect of the relevant Adjustment Process.

9.20.5. If a Notice of Disagreement relates to information provided to the IMO by a Metering Data Agent or System Management then as soon as ~~practical~~ practicable, but not later than five Business Days after the IMO confirms receipt of the Notice of Disagreement, the IMO must;

- (a) notify the Metering Data Agent or System Management (as applicable) of any item of information provided by them to which the Notice of Disagreement relates;



- (b) notify the Metering Data Agent or System Management (as applicable) of the time and date by which the IMO requires a response, where the date is to be no later than 60 days after the date on which the IMO confirmed receipt of the Notice of Disagreement; and
- (c) require the Metering Data Agent or System Management (as applicable) to investigate the accuracy of the item and to provide a response by the time specified under paragraph (b):
 - i. reporting on the actions taken to investigate the accuracy of the item; and
 - ii. if applicable, a revised value for the item, which may be a revised value, that the Metering Data Agent or System Management (as applicable) considers to be in compliance with these Market Rules and accurate.

9.20.7. The IMO must, as soon as ~~practical~~practicable, but within three months of confirming receipt of a Notice of Disagreement respond to a Market Participant who issued a Notice of Disagreement indicating the actions (if any) the IMO will take in response to the Notice of Disagreement, where such actions may include:

- (a) revising information provided to the IMO by Metering Data Agents and System Management (as applicable), and the reasons provided to the IMO for those revisions, in accordance with clause 9.20.5;
- (b) revising information developed by the IMO and used as an input to the settlement process, and the reason for the revision, as determined in accordance with clause 9.20.6; and
- (c) whether the IMO considers an error was made in the settlement calculations that has produced an incorrect Settlement Statement.

9.24.10. If, after raising a Default Levy in respect of a Payment Default in accordance with clause 9.24.5, the IMO recovers all or part of the relevant shortfall from the defaulting Market Participant, then it must use the amount recovered to refund Default Levy amounts paid under clause 9.24.7 in respect of the Payment Default as soon as ~~practical~~practicable but not later than the end of the calendar month following the month in which the amount is recovered. The IMO will determine the amount to be refunded to each Market Participant which paid a Default Levy amount under clause 9.24.7 in respect of the Payment Default (as adjusted, if applicable, under clause 9.24.9). In determining the amount to be refunded to a Market Participant, the IMO must have regard to:

- (a) the amount recovered; and

- (b) the Default Levy amount paid by the Market Participant under clause 9.24.7 (as adjusted, if applicable, under clause 9.24.9) as a proportion of the total of those amounts paid by all Market Participants.

10.5.1. The IMO must set the class of confidentiality status for the following information under clause 10.2.1, as Public and the IMO must make each item of information available from the Market Web-Site after that item of information becomes available to the IMO:

...

- (y) as soon as ~~possible~~ practicable after a Trading Interval:
 - i. the total generation in that Trading Interval;
 - ii. the total ~~spinning-reserve~~ Spinning Reserve in that Trading Interval;
 - iii. an initial value of the Operational System Load Estimate, taken directly from System Management's EMS/SCADA system.

where these values are to be available from the IMO Web Site for each Trading Interval in the previous 12 calendar months; and

- (z) as soon as ~~possible~~ practicable after real-time:
 - i. the total generation;
 - ii. the total ~~spinning-reserve~~ Spinning Reserve;
 - iii. an initial value of the Operational System Load Estimate, taken directly from System Management's EMS/SCADA system;

where these values are not required to be maintained on the IMO Web Site after their initial publication.

10.7.1. The IMO must set the class of confidentiality status for the following information under clause 10.2.1, as Rule Participant Restricted Information and the IMO must make this information available from the Market Web Site:

- (a) all Reserve Capacity Offer information issued by that Market Participant and all details of Special Price Arrangements for that Market Participant prior to the publication of that information in accordance with clause 10.5.1(f);
- (b) Market Participant specific Reserve Capacity Obligations;



- (c) Market Customer specified Individual Capacity Reserve Capacity Requirements partitioned into those associated with Intermittent Loads and those not associated with Intermittent Loads;

...

10.8.2. The IMO must set the class of confidentiality status for all Electricity Generation Corporation information specified in ~~clauses~~ clause 7.6A as Rule Participant Dispatch Restricted Information with the exception of information specified by the Electricity Generation Corporation under clauses 7.6A.2(g) and 7.6A.3(c).

Glossary:

Certified Reserve Capacity: For a Facility, and in respect of a ~~Reserved~~ Reserve Capacity Cycle, is the quantity of Reserve Capacity that the IMO has assigned to the Facility for the Reserve Capacity Cycle in accordance with clause 4.11 or clause 4.28B, as adjusted under these Market Rules including clause 4.14.8. Certified Reserve Capacity assigned to a Facility registered by a Market Participant is held by that Facility.

Downward Deviation ~~Administrative~~ Administered Price (DDAP): The amount calculated under clause 6.14.6.

Facility Dispatch Tolerance: The quantity by which the Metered Schedule of a Scheduled Generator registered by a Market Participant other than the Electricity Generation Corporation can deviate from the Dispatch Schedule for that Scheduled Generator before the Upward Deviation ~~Administrative~~ Administered Price (UDAP) or the Downward Deviation ~~Administrative~~ Administered Price (DDAP) will be applied to that deviation in settlement as determined under clause 6.17.9.

Local Black Start Procedures: The procedures developed under clause 3.7.4, by each Scheduled Generator and Non-Scheduled Generator in accordance with the guidelines published by System Management under clause 3.7.3.

Marginal Cost ~~Administrative~~ Administered Price (MCAP): The dollar per MWh price calculated in accordance with clause 6.14.2.

Upward Deviation ~~Administrative~~ Administered Price (UDAP): The amount calculated under clause 6.14.5.



APPENDIX 1: FULL DETAILS OF THE PROPOSAL

As part of its ongoing review and aim for continuous improvement of the Market Rules, the IMO has committed to submitting three Rule Change Proposals per year to address minor and typographical errors that have been identified in the Market Rules.

This Rule Change Proposal is the second minor, typographical and manifest error proposal for 2010.

The amendments outlined in this Rule Change Proposal improved the language and punctuation used, corrected Market Rule references, removed unnecessary ambiguity in identified clauses and eliminated any manifest errors. The IMO considers that this will enhance the integrity of the Market Rules.

The following table outlines the amendments, as well as an assessment of the amendments against clause 2.5.9 (the criteria that a Rule Change Proposal must meet in order to be processed using the Fast Track Rule Change Process)



Clause(s)	Explanation of proposed amendments	Fast track assessment, type of amendment (refer clause 2.5.9)
2.10.7	<p>Currently the Market Rules could be interpreted to allow Procedure Change Submissions to be made only on a Procedure Change Submission form. It should be noted that this is different to the Rule Change Process.</p> <p>The IMO, while preferring submissions to be made on a standard form, considers that not taking into account a submission because it is not on the correct form is contrary to its obligations to:</p> <ul style="list-style-type: none"> • conduct its consultation processes in good faith; and • ensure that its consultation processes allow a reasonable opportunity for relevant stakeholders to present their views (clause 2.21.2). <p>Therefore the IMO proposes to clarify that a Procedure Change Submission may be made using the Procedure Change Submission form on the website.</p>	<p>The IMO submits that not being able to take into account a submission because it is on a non-standard form is a manifest error. As such, the proposal fulfils sub-clause 2.5.9(b).</p>
2.34.2A, 2.34.10, 2.37.5, 3.17.1, 3.21.4, 3.21.7, 6.2.2A, 6.2A.2, 6.3B.3, 6.3C.3, 6.5.2, 6.5A.2, 6.5C.2, 6.19.3, 6.19.4, 6.19.9, 7.11.3, 7.11.4, 7.11.6A, 7.11.9, 9.4.5, 9.20.5, 9.20.7 and 9.24.10.	<p>Currently the Market Rules use the terms “as soon as practical” and “as soon as practicable” interchangeably.</p> <p>Practicable means that something can be done in practice, whereas practical means that that something has to do with practice rather than theory, or that it makes something function well.</p> <p>The IMO has assessed all the instances of “practical” in the Market Rules and</p>	<p>The IMO submits that these proposed changes will improve the integrity of the Market Rules. The changes do not seek to amend the operation of the Market Rules. As such, the proposal fulfils sub-clause 2.5.9(a), in that it is of a minor or procedural nature.</p>

Clause(s)	Explanation of proposed amendments	Fast track assessment, type of amendment (refer clause 2.5.9)
	consequently proposes to amend these to “practicable”.	
3.4.5 and 3.5.6	Amend “as soon as it is able” to “as soon as practicable”. See above.	See above.
3.17.6 and 10.5.1	Amend “as soon as possible” to “as soon as practicable”. See above.	See above.
4.8.3, 6.3A.3, 6.4.3, 6.5.1A, 6.6.2A, 6.14.1, 6.21.1, 6.21.2, 9.17.3 and 10.7.1	Amendments to use the correct defined term in the Market Rules.	The IMO submits that these proposed changes will improve the integrity of the Market Rules. The changes do not seek to amend the operation of the Market Rules. As such, the proposal fulfils sub-clause 2.5.9(a), in that it is of a minor or procedural nature.
6.2.2, 6.3A.2, 6.3B.1B, 6.3C.9, 6.4.1, 6.5C.6, 6.6.2A, 6.6.5, 6.7.2, 6.16.1, 6.20.1, 6.20.9A, 8.7.1, 9.4.7 and 9.18.3	Grammatical, spelling and/or punctuation amendments.	See above.
6.5.4, 9.19.5 and 10.8.2	Inclusion of the word “clause” before the clause reference.	See above.
6.18.2	Remove the words “the sum of” as there is only one component.	See above.
7.10.5	Clause 7.10.5 was included in the Amending Rules for RC_2009_22 ³ . However, the drafting of the Amending Rule leads to System Management unintentionally having to warn Market	The IMO submits that this is a manifest error, in that the drafting prevents System Management from doing what the original Rule Change Proposal intended to allow.

³ See www.imowa.com.au/RC_2009_22

Clause(s)	Explanation of proposed amendments	Fast track assessment, type of amendment (refer clause 2.5.9)
	<p>Participants about deviations from Resource Plans when inside the Tolerance or Facility Tolerance Range (when the deviation threatens Power System Security or Reliability or would require System Management to issue instructions to Verve Energy or other Registered Facilities). The intention of RC_2009_22 was to exempt System Management from having to warn Market Participants about deviations from Resource Plans when inside the ranges. The IMO proposes to amend “or” to “and” between sun-clauses (c) and (d) to fix this error.</p>	
9.4.7	Correction to clause referencing.	The IMO submits that an incorrect clause reference is a manifest error. As such, the proposal fulfils sub-clause 2.5.9(b).
Glossary	<ul style="list-style-type: none"> • Certified Reserve Capacity – replace the word “Reserved” with “Reserve”; • Facility Dispatch Tolerance, DDAP, UDAP, and MCAP definitions – replace the word “Administrative” with “Administered”; and • Add a definition for “Local Black Start Procedures”, this phrase was introduced in the Amending Rules for RC_2008_21 but was not defined in the glossary. 	The IMO submits that these proposed changes will improve the integrity of the Market Rules. The changes do not seek to amend the operation of the Market Rules. As such, the proposal fulfils sub-clause 2.5.9(a), in that it is of a minor or procedural nature.